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September 8, 2021

**VIA E-FILE**

Ms. Jocelyn D. Boyd  
Chief Clerk and Administrator  
SC Public Service Commission  
101 Executive Center Drive  
Columbia, SC 29210

RE: Dominion Energy South Carolina, Inc. Coal Retirement Docket Opened Pursuant to  
Commission Order No. 2021-418  
Docket No. 2021-192-E

Dear Ms. Boyd:

Enclosed please find for filing the Petition to Intervene Out of Time on behalf of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record.

If you have questions, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.

Scott Elliott

SE/lbk  
Enclosures


cc: All parties of record (w/encl.)

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2021-192-E**

IN RE:	)	
Dominion Energy South Carolina, Inc.	)	<b>PETITION TO INTERVENE OUT OF TIME BY SOUTH CAROLINA ENERGY USERS COMMITTEE</b>
Coal Retirement Docket Opened	)	
Pursuant to Commission Order No. 2021-418 )		

The South Carolina Energy Users Committee (“SCEUC”) hereby petitions the South Carolina Public Service Commission (“Commission”) pursuant to R.103-825 of the Commission’s rules and regulations to intervene and to be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

1. That on June 9, 2021, the Commission issued a Directive stating:

 The revisions to the DESC 2020 IRP previously ordered by the Commission resulted in DESC’s selection of Resource Plan 8 “as the ‘preferred portfolio’ to lessen ratepayer impact, promote reliability, incorporate renewable energy, reduce carbon dioxide emissions, and considered the least risky of the resource plans. RP 8 also retires the Wateree and Willams coal plants in 2028 and converts the Cope coal plant to natural gas in 2030.” The Directive instructed the Clerk’s Office to issue a notice for intervention and comment from all interested parties and stakeholders.

2. That SCEUC is an association organized in the State of South Carolina, consisting of large industrial consumers of energy which are engaged in various manufacturing enterprises

throughout the State; SCEUC is organized for the purposes of intervening and participating in regulatory proceedings to advocate for cost based electric rates that are just and reasonable.

3. That members of SCEUC take electric service from DESC, consuming and purchasing substantial amounts of electricity from the Company.

4. That SCEUC and its members have a real, material, and substantial interest in the subject matter to be addressed and resolved by the Commission in this docket. SCEUC members will suffer an adverse impact if Resource Plan 8 fails to lessen ratepayer impact, adequately promote reliability, incorporate renewable energy, and/or reduce carbon dioxide emissions and proves to be more risky than anticipated resulting in increased electric rates; as a consequence, SCEUC's members will be aggrieved by an order by the Commission that ultimate results in increased electric rates.

5. That the interests of SCEUC's members are not adequately represented by the current parties to this proceeding.

6. That SCEUC requests that the Commission grant its petition to intervene out of time. The Notice of hearing and prefiling schedule were issued in this docket September 3, 2021. The transmittal letter was issued September 3, 2021, and has scheduled the prefiling of direct testimony November 15, 2021, with rebuttal testimony to be prefiled November 29, 2021. The Directive creating this docket sought to encourage comment from all interested parties and stakeholders. Permitting SCEUC to intervene out of time will advance the Commission's goal of encouraging the widest participation in these proceedings as is practicable. At this stage of the proceedings no party or stakeholder will be prejudiced by permitting SCEUC to intervene out of time.

7. That given the state of the record at this stage of the proceedings, SCEUC lacks sufficient information to fully develop and state its position in this proceeding at this time.

7. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it and should be allowed so that a full and complete record addressing its views and concerns can be developed.

8. That in accordance with Rule R. 103-804 (S) of the Commission's Rules of Practice and Procedure, Petitioner is represented by counsel in this proceeding:



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WHEREFORE, Petitioner prays for the following relief:

- a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- c. For such other and further relief as is just and proper.


[Signature on next page]

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*Attorney for the South Carolina Energy  
Users Committee*



Columbia, South Carolina  
September 8, 2021

## CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them via Electronic Mail on the date indicated below:

RE: Dominion Energy South Carolina, Inc. Coal Retirement  
Docket Opened Pursuant to Commission Order No. 2021-248

DOCKET NO.: 2021-192-E

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PLEADING:

Petition to Intervene Out of Time

September 8, 2021

  
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